

EXHIBIT A

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NEW YORK

IN RE:

THE DIOCESE OF ROCHESTER,

Debtor.

)
) Chapter 11
)

) Case No. 19-20905
)
)

**[PROPOSED] ORDER (I) QUASHING SUBPOENAS ISSUED BY CONTINENTAL
INSURANCE TO JEFF ANDERSON AND JEFF ANDERSON & ASSOCIATES, OR, IN
THE ALTERNATIVE (II) FOR A PROTECTIVE ORDER**

This matter coming before the Court on the Motion of the Official Committee of Unsecured Creditors (the “**Committee**”) of the Diocese of Rochester (the “**Diocese**” or the “**Debtor**”) for entry of an order (i) pursuant to Federal Rule of Civil Procedure (“**FRCP**”) 45(d), made applicable herein pursuant to Federal Rule of Bankruptcy Procedure (“**Bankruptcy Rule**”) 9016, to quash the Deposition Subpoenas issued by Continental Insurance Company (“**Continental**”) to Jeff Anderson of Jeff Anderson & Associates PA, and Jeff Anderson & Associates PA (together, with Jeff Anderson, the “**Anderson Firm**”), or, in the alternative (ii) for a protective order pursuant to FRCP 26(c), made applicable herein pursuant to Bankruptcy Rules 9014 and 7026 [Docket No. ____] (the “**Motion**”);¹ the Court having reviewed and considered the Motion; the Court having found that (i) the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334, (ii) this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2), and (iii) notice of the Motion as described in the Motion was proper under the circumstances; and the Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein;

¹ Capitalized terms used and not otherwise defined herein have the meaning ascribed thereto in the Motion.

and after due deliberation and good and sufficient cause appearing therefor, it is hereby ORDERED that

1. The Motion is GRANTED.
2. The Deposition Subpoenas are hereby quashed and shall not be enforced.
3. The Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation of this Order.

Dated: Rochester, New York
_____, 2025

THE HONORABLE PAUL R. WARREN
UNITED STATES BANKRUPTCY JUDGE